

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL NO. 16-2738 (FLW) (LGH)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' CROSS NOTICE OF TAKING ORAL
DEPOSITION OF JOHN B. MCKEEGAN**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs, by and through the undersigned counsel, hereby cross-notice the videotaped deposition upon oral examination of John B. McKeegan in the above-referenced matter. A copy of the original deposition notice is attached as Exhibit A.

Plaintiffs reserve the right to take a supplemental (non-duplicative) deposition of John B. McKeegan as may be needed based upon the production of documents and other discovery to occur subsequent to the presently scheduled deposition.

The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time:

September 27, 2021, at 10:00 a.m. (EST) via ZOOM.

The deposition will be videotaped before a certified court reporter and may be used for the purposes of discovery or for use by Plaintiff as evidence at trial, both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: September 26, 2021

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ P. Leigh O'Dell
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ATTORNEY FOR PLAINTIFFS

Exhibit A

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI**

VICKIE FORREST, et al.,

Plaintiffs,

vs.

JOHNSON & JOHNSON, et al.,

Defendants

Case No. 1522-CC00419-02

**PLAINTIFFS' AMENDED NOTICE OF TAKING REMOTE ORAL AND VIDEOTAPED
TRIAL DEPOSITION OF JOHN B. MCKEEGAN**

TO: Counsel of Record

DATE AND HOUR: September 27, 2021 at 10:00 a.m. EST

WITNESS TO BE DEPOSED: John B. McKeegan

STYLE OF DEPOSITION: Steno & Video

COURT REPORTER: **Golkow Court Reporting**

PLEASE TAKE NOTICE that, pursuant to Rule 57 of the Missouri Rules of Civil Procedure, the Plaintiffs, by and through undersigned counsel, will conduct the remote videotaped deposition upon oral examination before a person authorized to administer oaths, of John B. McKeegan in the above-referenced matter. The deposition will be conducted remotely; a zoom link will be circulated in advance of the deposition. The deponent and all persons wishing to attend the deposition shall provide counsel for Plaintiffs with their email addresses no later than three days before the deposition. The deposition will continue day-to-day until completed.

The deposition will be videotaped before a certified court reporter from Golkow Court Reporting, 877-370-3377, and may be used for the purposes of discovery or for use by Plaintiffs as evidence at trial, or both.

Dated: September 21, 2021

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed and electronically served by way of the Court's electronic filing system this 21st day of September, 2021.

/s/ W. Wylie Blair